



Stephen B. Kemp
Vice President
Health, Environment & Safety

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Honorable Mike Leavitt, Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Dear Administrator Leavitt:

This is in response to Mr. Charles M. Auer's April 12, 2004 letter regarding the HPV Challenge Program. Mr. Auer's letter requested an update on the following chemicals:

- Ethanethiol (CAS 75-08-1) and 2-methyl-2-propanethiol (CAS 75-66-1) – OxyChem is sponsoring these chemicals through a consortium called the Mercaptans/Thiols Council.
- Dodecanoic acid, ammonium salt (CAS 2437-23-2) - OxyChem is sponsoring this chemical through the Soap and Detergents Association's Aliphatic Acids Consortium. The work is being completed under the International Council of Chemical Associations (ICCA) HPV initiative.
- 3,5-dichloro-Benzoyl chloride (CAS 2905-62-6) - OxyChem shut down its manufacturing operations for this chemical; therefore, OxyChem is no longer sponsoring the chemical. OxyChem was the only US company that manufactured 3,5-dichloro-Benzoyl chloride; therefore, it is no longer an HPV chemical.
- 1,2,3,4,7,8,9,10, 13,13,14,14-dodecachloro-1,4,4a,5,6,6a,7,10,10a,11,12,12a-dodecahydro-1,4:7,10-Dimethanodibenzo [a,e]cyclooctene (CAS 13560-89-9) - The robust summary for this compound has been prepared. The draft is currently under review and will be submitted to EPA as soon as possible.

OxyChem is committed to the voluntary HPV challenge program to address data needs for all of the HPV chemicals that we make. OxyChem is fulfilling that commitment. If you need additional information, please contact Debbie Schober at 972-404-4969.

Thank you,

**Occidental Chemical Corporation**

Corporate Office
Occidental Tower
5005 LBJ Freeway, Dallas, TX 75244-6119
P.O. Box 809050 Dallas, TX 75380-9050
972/404-3564
Internet Address: steve_b._kemp@oxy.com

